

## REMARKS

### Amendment of the Specification

To clarify an apparent typographical error in the Preliminary Amendment dated herein 24 March 2000, and to correct a typographical error in the affected paragraph, applicants hereby amend the paragraph beginning at page 2, line 11, of the specification, as shown on the attached sheet. No new matter is added by the amendment. Applicants respectfully request entry of the amendment.

### Objection to the Specification

At paragraph 2 of the Detailed Action the Examiner states that the application does not contain an abstract as required by 37 CFR 1.72(b). A copy of the abstract published with the International Application is attached hereto on a separate sheet. Applicants respectfully request reconsideration and withdrawal of the objection.

### Objection to Claims 8 and 9

At paragraph 3 of the Detailed Action the Examiner has objected to claims 8 and 9 as improper. Without admitting the propriety of the objection, Applicants hereby amend the claims in accordance with the suggestion of the Examiner. Applicants respectfully request reconsideration and withdrawal of the objection.

### The Rejection of Claims Under 35 U.S.C. § 112

At paragraphs 4 and 5 of the Detailed Action the Examiner has rejected Claims 7 and 12 under 35 USC § 112 as indefinite. Applicants note that no claim 12 is currently pending in the application, but that claim 10 comprises language similar to that specified by the Examiner. Applicants have proceeded on the assumption that claim 10 was the intended reference of the Examiner.

Without admitting the propriety of the rejection, Applicants hereby amend claims 7 and 10 in accordance with the suggestion of the Examiner. Applicants respectfully request reconsideration and withdrawal of the rejection.

#### The Rejection of Claims Under 35 U.S.C. § 102

At paragraphs 7 - 11 of the Detailed Action the Examiner has rejected Claims 1 – 4 and 5 – 7 under 35 USC § 102(b) as assertedly anticipated by Jackson, UK Patent Application 2,214,678. Applicants respectfully traverse. To anticipate a claim, a single reference must disclose each and every one of the limitations of the claim; the Jackson reference fails either to disclose or suggest each and every limitation of Applicants' claims. Applicants respectfully submit that claims 1 – 4 and 5 – 7 are neither anticipated nor rendered obvious by Jackson, alone or in combination with any other cited reference. Applicants respectfully request reconsideration and withdrawal of the rejections.

#### Claims 1 - 4

Claims 1 – 4 are drawn to a pneumatic control system including a pump and at least one inflatable/deflatable article, comprising communication means provided on each of the pump and article, wherein upon connection between the pump and article at least one of said communication means is capable of identifying the article and instructing the control means to activate the pump accordingly.

Jackson does not disclose, at least, communication means provided on each of a pump and an article, wherein upon connection between the pump and article at least one of said communication means is capable of identifying the article and instructing the control means to activate the pump accordingly. Jackson discloses a (non-inflatable) valve cap, apparently attachable to a tyre, the valve cap comprising a bar code embodying tyre pressure information, so that upon insertion of the cap into a reader (i.e, upon connection between a reader and a non-inflatable article) the reader reads tyre pressure information

from the cap. The tyre pressure information read from the valve cap is not capable of identifying the article and/or instructing the control means to activate the pump accordingly. The tyre pressure information is capable, at most, of being used to activate a compressed air supply to bring an attached, unidentified article to a predetermined static pressure. Conveying tyre pressure information is not the same as identifying an inflatable article, nor does the teaching of a system for conveying such information render a system for identification of an inflatable article obvious. Nor is conveying a tyre pressure the same as, or render obvious, instructing a control means to activate a pump in accordance with the identity of an article, as set forth, for example, at page 3, line 6 – page 5, line 29, of Applicant's specification.

Applicants' invention, as claimed, is distinct and non-obvious in light of the cited references, and offers distinct advantages as disclosed throughout Applicants' specification.

#### Claims 5 - 7

Claims 5 – 7 are drawn to a pneumatic control system including a pump and an inflatable/deflatable support for a patient to lie on, control means to operate the pump, and connection means for connecting the support and pump for fluid flow therethrough, wherein the pump and support have respective communication means, at least one said communication means is capable of identifying the support and to instruct the pump control means to activate the pump accordingly.

The arguments stated above in regard to claims 1 – 4 apply to claims 5 – 7 as well, and for the same reasons.

In addition, Jackson does not teach (or fairly suggest, alone or in combination with any other cited reference(s)) use of the system it discloses in conjunction with an inflatable/deflatable support for a patient to lie on. Although the examiner suggests that it is possible to lie on a tyre, a tyre is not normally used as a proper support for a patient to lie on, and it is not fair to suggest that it

is.

The Rejection of Claims Under 35 U.S.C. § 103

At paragraph 13 of the Detailed Action the Examiner has rejected Claims 8 – 10 under 35 USC § 103(a) as assertedly obvious over Jackson in view of Wright, US patent 3,570,495. Applicants respectfully traverse.

Jackson discloses a valve cap for imparting desired pressure information for pneumatic tyres. As discussed above, Jackson does not anywhere disclose or suggest communication means provided on each of the pump and an article, wherein upon connection between the pump and article at least one of said communication means is capable of identifying the article and instructing the control means to activate the pump accordingly. In addition, Jackson makes no mention of any inflatable articles other than tyres for use in association with his invention. In particular, as noted by the Examiner, Jackson fails to disclose or suggest any apparatus that could be used as an aid in inflating garments.

Nor is there any disclosure in the Wright reference cited by the examiner to cure the deficiencies of Jackson in rendering Applicants' claimed invention obvious; or any motivation in either Jackson or Wright to combine their respective teachings in any manner whatsoever.

In as much as the cited references provide no suggestion or motivation for Applicants' claimed invention, Applicants respectfully request reconsideration and withdrawal of the rejection.

### CONCLUSION

Applicants believe that they have fully responded to the Examiner's concerns and that the claims are now in condition for immediate allowance. Applicants respectfully request reconsideration and immediate allowance of the claims.

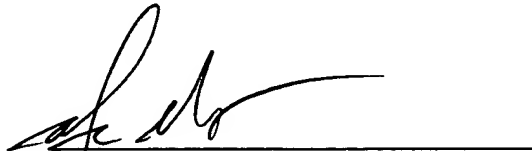
Please charge any deficiency or credit any overpayment in any fee required for this response to Deposit Account No. 02-4270.

Applicant requests that any questions concerning this matter be directed to the undersigned at (212) 895-2906.

I certify that this paper, together with any documents referred to as attached or enclosed, are being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to the Commissioner of Patents, Washington, DC 20231.

Respectfully submitted,

Dated: 5 March 2007



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**ABSTRACT PRESENTED ON SEPARATE SHEET  
PURSUANT TO 37 C.F.R. 1.72**

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**ABSTRACT**

By A pneumatic system consists of an inflatable/deflatable article, for example, a compression garment (21) connected to a pump (20) by connectors (12 and 11), respectively. The connector (12) attached to the garment (21) carries an RFID transponder (30) and a corresponding radio circuit (31) is located within the pump (20). In use, the transponder (30) transmits and receives information to and from the pump radio circuit (31). The information exchanged is used by the pump control system to activate the pump and to operate the pump to provide the particular operating parameters for that garment, for example, pressure, inflation/deflation cycle, duration of treatment, etc.

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